AOb-OOOZ
BAKER
HUGHES

12645 West Airport Blvd. Sugar Land, TX 77478 USA Tel 281-275-7345 Fax 281-275-7385

Halina E. Caravello

Health, Safety, Environmental Quality & Regulatory Affairs

Director

Web site: www.bakerhughes.com/bapt

Baker Petrolite

September 8, 2000

The Performance Track Information Center c/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

Subject: Performance Track Application

ablua & Caramello

Dear Sir/Madam:

I am pleased to submit the Performance Track Application for the Houston, Texas Blend Plant Facility of Baker Petrolite Incorporated. This facility employs 17 dedicated employees that are committed to continual improvement and embody the tenants of this program. We are pleased to be considered for this program. Should you have any questions or require additional information, please feel free to contact me at (281) 275-7345.

Sincerely,

Halina E. Caravello

xc: R. Mertz

T. Matthies

J. Joseph

G. Martin



National Environmental Achievement Track

Application Form

Baker Petrolite - Houston Blend Plant
Name of facility
BAKER HUGHES / Baker Petrolite
Name of parent company (if any)
16950 Wallisville Rd.
Street address
Street address (continued)
Houston, TX 77049
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Thomas Matthies/Halina Caravello

Title Plant Manager/Director, HSE/Q&RA

Phone (281)457-4700/(281)275-7345

Fax (281)457-4755 / (281)-275-7385

E-mail Thomas.Matthies@Baker Petrolite.com/Halina.Caravello@BakerPetrolite.com

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- · Identify your environmental requirements.



1	What do you do or make at your facility?	The Channelview facility is a small operation with Baker Petrolite employing 18 employees. The mactivities at this facility include the blending, repackaging, storage and distribution of special chemicals for the Oilfield and Industrial Market. The products are all used in industrial settings are include products such as corrosion and scale inhibitors, water clarifiers, oil and water demulsified and other products required to make the production of crude and assoicated refinning aspects more efficient and sound.	
2	List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.	SIC 2899	
3	Does your company meet the Small Business Administration definition of a small business for your sector?	☐ Yes ☑ No	
4	How many employees (full-time equivalents)	☐ Fewer than 50	
	currently work at your facility?	☐ 50-99	
		□ 100-499	
		☐ 500-1,000	
		☐ More than 1,000	

Section A, continued

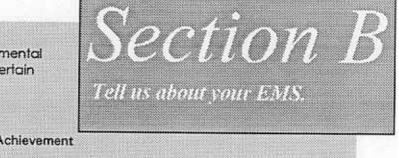
5	Does your facility have an EPA ID number(s)?	⊠ Yes	□No
	If yes, list in the right-hand column.	TXD 000802934	4
6	Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.		
7	Check the appropriate box in the right-hand column.		ne requirements above. ed the Checklist with my
	Optional: Is there anything else you would like to tell us about your facility?	facility that had dedicated emhard to obtain certification. Twell as communicated as pects of this have won an industry and Beyond" Communicated as Daily inspects. Health Safet Award c. EHCMA merid. LEPC members. Trained fire in the dedicated and the safet as the s	already put into place include and ents are: ctions of Tank Farm by and Environmental Excellence mber er

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

1 Check **yes** if your EMS meets the requirements

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



	for each element below as defined in the instructions.	
	a. Environmental policy	Yes
	b. Planning	Yes
	$\it c$. Implementation and operation	⊠ Yes
	\emph{d} . Checking and corrective action	Yes
	e. Management review	∑ Yes
2	Have you completed at least one EMS cycle (plan-do-check-act)?	⊠ Yes
3	Did this cycle include both an EMS and a compliance audit?	⊠ Yes
4	Have you completed an objective self- assessment or	⊠ Yes
	third-party assessment of your EMS?	Self-assessment
	If yes, what method of EMS assessment did you use?	☐ GEMI ☐ Other
		СЕМР
		☑ ISO 14001 Certification
		Other

Facilities must show that they are committed to improving their environmental performance. This med that you can describe past achievements and will modulure commitments.

Section Tell us about your past achievements and future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the curre	nt level?
Reduction of Hazardous Waste	Quantity 1998- 506,756	Units Pounds	Quantity 174,169 -	Units Pounds
Reduction of nazardous waste	1999- 357,290	roonas	9/2000	1 001103

i. How is the current level an improvement over the previous level?

Through our diligent efforts, we have been able to reduce the Hazardous Waste generated annually.

ii. How did you achieve this improvement?

This improvement was achieved by our current Waste Minimization procedures. Included in our waste minimization plan is reuse of rinsates generated through our vessel cleaning process.

Second aspect you've selected

What aspect have you selected?	What was the pre (2 years ago)?	evious level	What is the curre	nt level?
Reduction of Non- hazardous waste	Quantity 1,351,011 - 1998 747,697 - 1999	Units Pounds	Quantity 521,980	Units Pounds
 i. How is the current level previous level? 	an improvement o	ver the		
Our current improveme	nt has been reduc [.]	tion of Non-hazo	ardous waste gener	ated annually.
ii. How did you achieve th	nis improvement?			
This improvement has b of pallet material, reduc				

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

- b. Is this aspect identified as significant in your
- EW25
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of

production or output.

- Solid Waste Hazardous
- Option A:

Absolute value

1999: 357,290 lbs (Quantity/Units)

Option B:

in terms of

units of production

or output

(Quantity/Units)

 d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. e. How will you achieve this improvement? 	Option A: Absolute value Option B: In terms of units of production or output Reduce hazardous waste b improved blender rinsate re	
Second aspect you've selected		
a. What is the aspect?	Solid Waste - Non-hazardou	JS
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	 Option A: Absolute value Option B: In terms of units of production or output 	1999: 747,697 lbs (Quantity/Units) (Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	reduce 112,154 lbs in 3 years (Quantity/Units) (Quantity/Units)
e. How will you achieve this improvement?	Reduce Non-hazardous wa will be achieved through re- processes and improved mo	ste by 5% per year. This fined recycling

Third aspect you've selected		
a. What is the aspect?	Emissions of VOCs	
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	18.77 tons (Quantity/Units) (Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	Option A:	Reduction of 2.82 tons over next 3 years (Quantity/Units)
e. How will you achieve this improvement?	We are in the process of evaluating various equipment options to improve operating efficiency and reduce the Total VOC emissions this site.	
Fourth aspect you've selected		
a. What is the aspect?	Prevention of accidental rele	ease
 b. Is this aspect identified as significant in your EMS? 	☐ Yes ☐ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	0 (Quantity/Units) (Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	0 (Quantity/Units) (Quantity/Units)

e. How will you achieve this improvement?

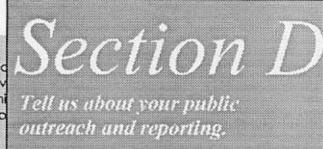
This will be achieved through:

Continuous training of employees.

Periodic inspections throughout the plant.

Continued proper maintenance of equipment and formal reviews of operating circumstances.

Facilities must demonstrate their commitment to public outreach and performance reporting. You should hav appropriate mechanisms in place to identify communicaters, to communicate with the public, and to proinformation on your environmental performance.



What do you need to do?

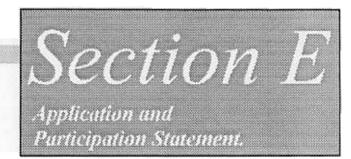
- Describe your approach to public outreach.
- List three references who are familiar with your facility.
- 1 How do you identify and respond to community 1. Open house - public meeting concerns? 2. Quarterly community outreach / Responsible Care activities 3. Personal communication with local businesses 2 How do you inform community members of Same as above important matters that affect them? 3 How will you make the Achievement Track ■ Website www.bakerhughes.com/BakerPetrolite Annual Performance Report available to the Newspaper public? Open Houses Other

4	Are there any ongoing citizen suits against your facility?	☐ Yes	⊠ No
	If yes, describe briefly in the right-hand column.		

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	LEPC	Gary Spaid	281-862-4485
State/Local Regulator	Texas Natural Resource Conservation Commission	J. Patrick Noll	713-767-3671
Other community/local reference	Industrial and Family Practice Clinic	Cindy Florio	713-453-8328

On behalf of Baker Petrolite Corporation's [my facility],



I certify that

I have read and agree to the terms and conditions, as specified in the National Environmental Achievement Track Program Description and in the Application Instructions;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date Thomas D. Matthies J. / 9-7-00

Printed Name/Title Thomas Matthies/ Plant Manager

Facility Name Baker Petrolite

Facility Street Address 16950 Wallisville Road, Houston, Texas 77049

Facility ID Numbers TXD000802934

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center c/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Nar	ne: Hous	ton Blend Plant	
Facility Loc		D Wallisville Road ton, TX 77049	
Facility ID !		000802934 108570/13580-001	
Air Pollution	Regulations		Check All That Apply
1.	National Emission Standards	for Hazardous Air Pollutants (40 CFR 61)	
2.	Permits and Registration of A		<u> </u>
3.	General Emission Standards,	Prohibitions and Restrictions	120
4.	Control of Incinerators		
5.	Process Industry Emission Sta	andards	区
6.	Control of Fuel Burning Equi	pment	Ø
7.	Control of VOCs		120
8.	Sampling, Testing and Report	ing	IX
9.	Visible Emissions Standards		IX
10.	Control of Fugitive Dust		凶
11.	Toxic Air Pollutants Control		凶
12.	Vehicle Emissions Inspection	s and Testing	
Other	r Federal, State, Tribal or Loc	al Air Pollution Regulations Not Listed A	bove (identify)
13.		1	_ 0
14.			

Hazardous Waste Management Regulations

1.	Identification and Listing of Hazardous Waste (40 CFR 261) - Characteristic Waste	Ø
	- Listed Waste	ΙŽ
2.		X
_ .	Standards Applicable to Generators of Hazardous Waste (40 CFR 262) - Manifesting	X)
	- Pre-transport requirements	X)
	- Record keeping/reporting	X
3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	X
	- Transfer facility requirements	
	- Manifest system and record-keeping	
	- Hazardous waste discharges	
4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)	
	- General facility standards	
	- Preparedness and prevention	
	- Contingency plan and emergency procedures	
	- Manifest system, Record keeping and reporting	
	- Groundwater protection	
	- Financial requirements	
	- Use and management of containers	
	- Tanks	
	- Waste piles	
	- Land treatment	
	- Incinerators	
5.	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	
6.	Interim Standards for Owners and Operators of New Hazardous Waste	
	Land Disposal Facilities (40 CFR 267)	
7.	Administered Permit Program (Part B) (40 CFR 270)	
		<u> </u>
Othe	r Federal, State, Tribal or Local Hazardous Waste Management Regulation	ons Not
Liste	d Above (identify)	
8.		
_		
9.		
••		
Hazardous N	laterials Management	
1.	Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	DXI
2.	Designation of Reportable Quantities and Notification of Hazardous	_
	Materials Spill (40 CFR 302)	X
3.	Hazardous Materials Transportation Regulations (49 CFR 172-173)	X
4.	Worker Right-to-Know Regulations (29 CFR 1910.1200)	X
5.	Community Right-to-Know Regulations (40 CFR 350-372)	凶

6.		
U.		
7.		
Waste	Management	
1.	Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)	
2.	Permit Requirements for Solid Waste Disposal Facilities	
3.	Installation of Systems of Refuse Disposal	
4.	Solid Waste Storage and Removal Requirements	
5.	Disposal Requirements for Special Wastes	
Othe Abov	r Federal, State, Tribal or Local Solid Waste Management Regulations Not Live (identify)	st
6.	Texas State Industrial Waste Registrations	
7.		
1.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)	
2.	Designation of Hazardous Substances (40 CFR 116)	
3.	Determination of Reportable Quantities for Hazardous Substances	
4.	(40 CFR 117)	
5.	NPDES Permit Requirements (40 CFR 122) Toxic Pollutant Effluent Standards (40 CFR 129)	
6.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403)	
7.	Organic Chemicals Manufacturing Point Source Effluent Guidelines	
••	and Standards (40 CFR 414)	
8.	Inorganic Chemicals Manufacturing Point Source Effluent Guidelines	
	and Standards (40 CFR 415)	
9.	Plastics and Synthetics Point Source Effluent Guidelines and Standards	
	(40 CFR 416)	
10.	Water Quality Standards	
11.	Effluent Limitations for Direct Dischargers	
12.	Permit Monitoring/Reporting Requirements	
13.	Classifications and Certifications of Operators and Superintendents	
13.	of Industrial Wastewater Plants	
13. 14.	of Industrial Wastewater Plants Collection, Handling, Processing of Sewage Sludge	
13.	of Industrial Wastewater Plants	

17.	Stormwater discharge permits	X
18.		
Drinking W	ater Regulations	
1.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146)	_
2.	National Primary Drinking Water Standards (40 CFR 141)	
3.	Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)	_
4.	Permit Requirements for Appropriation/Use of Water from Surface or	
5.	Subsurface Sources	
5. 6.	Underground Injection Control Requirements	
0.	Monitoring, Reporting and Record keeping Requirements for Community Water Systems	
(ider 7.	er Federal, State, Tribal or Local Drinking Water Regulations Not Listed Aboutify)	_
8.		_
о.		
Toxic Subst	<u>ances</u>	
1.	Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)	
2.	Import and Export of Chemicals (40 CFR 707)	
3.	Chemical Substances Inventory Reporting Requirements (40 CFR 710)	
4.	Chemical Information Rules (40 CFR 712)	
5.	Health and Safety Data Reporting (40 CFR 716)	
6.	Pre-Manufacture Notifications (40 CFR 720)	
7.	PCB Distribution Use, Storage and Disposal (40 CFR 761)	
8.	Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)	
9.	Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)	
Othe (iden	er Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Ab	ove
10.	Adverse effects reporting under TSCA	K
11.		П
8.0.		

Pesticide Regulations

1.	FIFRA Pesticide Use Classification (40 CFR 162)	
2.	Procedures for Disposal and Storage of Pesticides and Containers	
3.	(40 CFR 165)	
3. 4.	Certification of Pesticide Applications (40 CFR 171) Pesticide Licensing Requirements	
5.	Labeling of Pesticides	D Ø
6.	Pesticide Sales, Permits, Records, Application and Disposal Requirements	<u>κ</u> λ
7.	Disposal of Pesticide Containers	×
8.	Restricted Use and Prohibited Pesticides	
Other	Federal, State, Tribal or Local Pesticides Regulations Not Listed Above	(identify)
9.	State Registration of Pesticides	
10.	Pesticide Producing Establishment	
1.	Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)	
2.	RCRA Corrective Action (identify)	
	Federal, State, Tribal or Local Environmental Clean-Up, Restoration, C Regulations Not Listed Above (identify)	orrective
3.		
4.		